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July 2, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: AT&T Wireless Services, Inc.

In the Matter of Revision of the Commission's Rules to Ensure
Compatibility With Enhanced 911 Emergency Calling Systems

CC Docket No. 94-102

Dear Ms. Dortch:

As required by its *GSM Consent Decree*, AT&T Wireless Services, Inc. ("AWS") is submitting this letter to advise the Commission that it has completed validation testing of the network-based location technology provided by the Grayson Wireless division of Allen Telecom, Inc. ("Grayson"), which AWS is employing in its GSM network.¹ AWS and Grayson conducted tests in two first office applications ("FOAs") on AWS' Nokia and Ericsson infrastructures, and those tests demonstrate that the location technology complies with the Commission's Phase II accuracy requirements.

This letter also updates the Commission regarding progress AWS has made since its June 5, 2003 Interim Report² in connection with the June 30, 2003 benchmarks set

¹ *AT&T Wireless Services, Inc.*, File No. EB-02-TS-018, NAL/Acct. No. 200232100002, FRN 0003-7665-32, Order, FCC 02-283, at n.9 and ¶ 11(d) (rel. Oct. 9, 2002) ("*GSM Consent Decree*").

² *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, AT&T Wireless Services, Inc. Interim Report (filed June 5, 2003).

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forth in paragraph 9(a)(3) of the *GSM Consent Decree*. As AWS explained in its June 5 filing, software defects in certain equipment provided by Grayson required AWS to extend the FOA testing of the solution. AWS was concerned that, although the software problems appeared to be resolved, the short time remaining before June 30 could compromise AWS' ability to accomplish full Phase II integration at 2,000 cell sites by that date. As a result of the remarkable efforts of AWS' E911 deployment team in the last few weeks of June, however, AWS satisfied the *GSM Consent Decree's* June 30, 2003 benchmarks.

Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

/s/ Douglas I. Brandon

Douglas I. Brandon

cc: David H. Solomon, Chief, Enforcement Bureau
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